

### **AMC1 DTO.GEN.115(c) Declaration**

#### **SUBMISSION OF TRAINING PROGRAMMES WITH THE DECLARATION**

Except for training programmes for examiner standardisation or refresher courses, a DTO may include in the declaration only a reference to a training programme if this training programme:

- (a) has already been verified for Part-FCL compliance by the competent authority; or
- (b) has been developed by the competent authority as a standard training programme, if applicable.

### **GM1 DTO.GEN.210(a)(1)(i) Personnel requirements**

#### **OCCURRENCE-REPORTING SYSTEM COMPLIANT WITH REGULATION (EU) No 376/2014**

The following list provides an overview of the main elements of the occurrence-reporting system that is compliant with Regulation (EU) No 376/2014 and provides references to the relevant articles of that Regulation.

- (a) Occurrence-reporting system that caters for both mandatory and voluntary reporting (cf. Articles 4 and 5).

Note 1: The mandatory reporting system established under Regulation (EU) No 376/2014 is also intended for the reporting of those additional items that qualify for mandatory reporting and are defined in the EASA implementing rules.

Note 2: The voluntary reporting system is intended to facilitate the collection of details of occurrences that may not be captured by the mandatory system and of other safety-related information which is perceived by the reporting organisation as an actual or potential hazard to aviation safety.

- (b) Designation of one or more persons to independently handle the collection, evaluation, processing, analysis and storage of details of occurrences with regard to data collection and hazard identification (cf. Article 6(1)).

Note 1: In agreement with their competent authority, small-sized organisations may make use of simplified mechanisms to ensure the collection, evaluation, processing, analysis and storage of details of occurrences, possibly by sharing those tasks with other similar organisations.

Note 2: An existing internal safety-reporting scheme, which collects safety-relevant data, proposals and information, including data, proposals and information on potential safety issues that have not resulted in any occurrence, may serve as a basis for the mandatory and voluntary occurrence-reporting system. From this pool of safety relevant information and data collected internally, the organisation will determine whether a mandatory report is required or whether a voluntary report may be adequate.

- (c) Reporting details of occurrences collected under the mandatory scheme as soon as possible and in any event no later than 72 hours after becoming aware of the occurrence (cf. Article 4(8) & (9)).

Note 1: The reference to 'becoming aware of' an occurrence implies that a person in the organisation identifies the occurrence as falling into the category of a mandatory occurrence report — usually through being involved in the occurrence or witnessing it, but also on review or investigation of information reported to the organisation's safety reporting scheme. In the case of design or production organisations, the 72-hour period starts at the point when the unsafe condition is identified.

In the case of automated data collection systems, the 72-hour period starts when the person that is responsible for the analysis of the data detected the reportable occurrence.

Note 2: The 72-hour period does not apply to the reporting of details of occurrences which may involve an actual or potential aviation safety risk and safety-related information collected under the voluntary scheme. These are to be reported in a timely manner (cf. Article 5(5) & (6)).

- (d) Establishment of data quality checking processes to ensure that the information initially collected and the data stored in the database(s) are consistent (cf. Article 7(3)).

Note: It is understood that data quality checking processes should address four main areas:

- errors in data entry;
- completeness of data, specially referring to mandatory data;
- proper use of the ADREP<sup>2</sup> taxonomy;
- improve data consistency, notably between the information collected initially and the report stored in the database (cf. Article 7(3)).

- (e) Storage of occurrence reports that qualify for mandatory and voluntary reporting in one or more databases (cf. Article 6(5)) using standardised formats to facilitate information exchange and which are compatible with the ECCAIRS<sup>3</sup> software and ADREP taxonomy (cf. Article 7(4)).

Note: Organisations that are able to report through an ECCAIRS software compatible reporting system provided by their competent authority are deemed to be automatically compliant with the reporting system requirements in Article 7(4) and do not need to have their own ECCAIRS software compatible reporting system.

- (f) Application of the safety policy (cf. AMC1 DTO.GEN.210(a)(1)(ii)) to occurrences:

- (1) identification of the safety hazards that are associated with identified occurrences or groups of occurrences reported to the competent authority (cf. Article 13(1));
- (2) analysis of the related risks in terms of probability and severity of the outcome, as well as assessment of the risks in terms of tolerability;
- (3) based on the result of the risk assessment: determination of the need for mitigation action, as required for improving aviation safety (cf. Article 13(2)); and
- (4) monitoring the timely implementation and effectiveness of any mitigation action required (cf. Article 13(2)).

- (g) In addition to the actions required under paragraph (6) above, where the organisation identifies an actual or potential aviation safety risk as a result of the analysis of occurrences or group of occurrences:

- (1) transmission of the following information to the competent authority within 30 days from the date of notification of the occurrence to the authority (cf. Article 13(4)):
  - (i) the preliminary results of the risk assessment performed; and
  - (ii) any preliminary mitigation action to be taken.
- (2) where required, transmission of the final results of the risk analysis to the competent authority as soon as they are available and, in principle, no later than 3 months from the date of notification of the occurrence to the authority (cf. Article 13(4)).

<sup>2</sup> The ICAO Accident/Incident Data Reporting (ADREP) system.

<sup>3</sup> European Coordination Centre for Accident and Incident Reporting Systems.

Note: The legal obligation to provide the initial results of the analysis of the occurrence, follow-up reports and final results lies with the other organisation that issued the initial report. Where an organisation receives a copy of a report from another organisation that initially reported the occurrence to the competent authority, depending on its contribution to the actual or potential aviation safety risk underlying the occurrence, it may however be required to perform its own analysis of the issue reported and to provide a follow-up report to the competent authority.

- (h) Safety policy and just culture: Consultation of staff representatives to ensure mutual agreement on and adoption of the rules describing how ‘just culture’ principles are guaranteed and implemented within the organisation.

Note 1: The purpose of those rules is to ensure that employees and contracted personnel that report or are mentioned in occurrence reports, both mandatory or voluntary, are not subject to any prejudice by their employer or any other organisation for which the services are provided on the basis of the information supplied by the reporter (cf. Article 16(9)), unless an exception applies (cf. Article 16(10)).

Note 2: Staff representatives may be nominated either by the trade union(s) or by the staff themselves.

- (i) Ensuring that employees and contracted personnel are regularly provided with information concerning the analysis of, and follow-up on, occurrences for which mitigation action is taken (cf. Article 13(3)), while ensuring that only disidentified information is disseminated.
- (j) Ensuring that personal details are made available to staff of their organisation, other than the persons designated in accordance with paragraph (2), only where absolutely necessary to investigate occurrences with a view to enhancing aviation safety.
- (k) Ensuring that reports addressed to the competent authority contain at least the information listed in Annex I to Regulation (EU) No 376/2014.

#### **AMC1 DTO.GEN.210(a)(1)(ii) Personnel requirements**

##### SAFETY POLICY

- (a) The safety policy should define, in relation to the DTO training programme, at least the means and methods used for:
- (1) hazard identification;
  - (2) risk assessment; and
  - (3) effectiveness of the mitigation measures (implementation and follow-up).
- (b) The safety policy should additionally include the procedures required for occurrence reporting pursuant to Regulation (EU) No 376/2014 (cf. GM1 DTO.GEN.210(a)).

#### **AMC1 DTO.GEN.210(a)(2) Personnel requirements**

##### QUALIFICATION AND EXPERIENCE OF THE HEAD OF TRAINING (HT)

- (a) The HT should, with regard to the size and the training scope of the DTO, possess sufficient managerial capabilities in order to discharge their responsibilities, and should:
- (1) in the case of a DTO that provides training in aircraft or FSTDs, hold an unrestricted instructor certificate in accordance with Part-FCL with instructional privileges that are relevant to the training provided by the DTO, including sufficient experience as necessary;